IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Linda MIGLIORI, et al,

Plaintiffs,

v.

No. 5:22-cv-00397-JFL

LEHIGH COUNTY BOARD OF ELECTIONS, Defendant.

PROPOSED INTERVENOR ZAC COHEN'S MOTION TO INTERVENE AS AN INTERVENOR-PLAINTIFF

Proposed Intervenor Zac Cohen hereby moves to intervene as an Intervenor-Plaintiff in the above-captioned matter. Cohen seeks to intervene as of right in this action pursuant to F.R.C.P. 24(a)(2) or, in the alternative, seeks permissive intervention pursuant to F.R.C.P. 24(b)(1)(B). In support of this Motion, Cohen relies on the accompanying Brief in Support, which is incorporated.

Pursuant to F.R.C.P. 24(c), Cohen submits as Exhibit A to the Motion his proposed joinder in the Complaint.

Before filing the Motion with the Court, Cohen sought the concurrence in the relief requested from Plaintiffs' and Defendants' counsel via email on February 10, 2022. All parties have expressly stated that they do not object to this intervention.

WHEREFORE, Cohen respectfully requests that the Court grant his Motion and permit him to intervene as an Intervenor-Plaintiff in this action.

Respectfully submitted,

By:

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Attorney for Zac Cohen

Dated: February 11, 2022

CERTIFICATE OF CONCURRENCE OR NON-CONCURRENCE

Pursuant to Local Rule 7.1 and Paragraph to of the Initial Procedural Order, before filing this Motion with the Court, I sought the concurrence in the relief requested from Plaintiffs and Defendants via email on February 10, 2022. All parties have expressly stated that they do not object to this intervention.

Respectfully submitted,

By:

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